

**ORIGINAL**

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

UNITED STATES OF AMERICA

§  
§  
§  
§  
§

v.

SAAD AZIZ (104)

No. 4:20CR382  
Judge Jordan

**FILED**

APR 12 2023

Clerk, U.S. District Court  
Eastern District of Texas

**FACTUAL BASIS**

The defendant, **Saad Aziz**, hereby stipulates and agrees that at all times relevant to the Fourth Superseding Indictment herein, the following facts were true:

1. That the defendant, **Saad Aziz**, who is changing his plea to guilty, is the same person charged in the Fourth Superseding Indictment.
2. That the events described in the Fourth Superseding Indictment occurred in the Eastern District of Texas and elsewhere.
3. That **Saad Aziz** and one or more persons in some way or manner made an agreement to commit the crime charged in the Fourth Superseding Indictment, to knowingly, intentionally and unlawfully conspire, confederate and agree with each other, with intent to defraud, devised, or willfully participated in, with knowledge of its fraudulent nature, the above-described scheme and artifice to defraud and obtain property to wit: new devices.
4. That **Saad Aziz** knew the unlawful purpose of the agreement and joined in it with the intent to further it.

5. The loss of the wire fraud conspiracy was more than \$25,000,000 and involved over ten victims. **Saad Aziz** was in the business of receiving and selling the stolen property.

6. **Saad Aziz** relocated the fraudulent scheme involved in the Fourth Superseding Indictment to another jurisdiction.

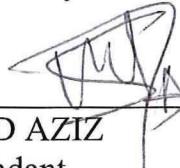
7. That **Saad Aziz** acted as a leader/organizer of the conspiracy which included five or more participants.

**DEFENDANT'S SIGNATURE AND ACKNOWLEDGMENT**

8. I have read this Factual Basis and the Fourth Superseding Indictment and have discussed them with my attorney. I fully understand the contents of this Factual Basis and agree without reservation that it accurately describes the events and my acts.

Dated:

11/8/23

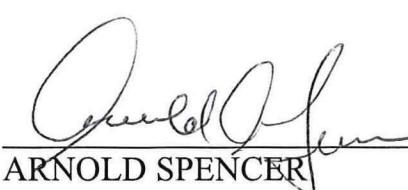
  
SAAD AZIZ  
Defendant

**COUNSEL FOR DEFENDANT'S SIGNATURE AND ACKNOWLEDGMENT**

9. I have read this Factual Basis and the Fourth Superseding Indictment and have reviewed them with my client. Based upon my discussions with the defendant, I am satisfied that the defendant understands the Factual Basis and the Fourth Superseding Indictment.

Dated:

11/10/23

  
ARNOLD SPENCER  
FARIAH AMIN  
Attorneys for Defendant